

Before the

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Global NAPs, Inc. Petition for Arbitration
Pursuant to Section 252(b) of the
Telecommunications Act of 1996 to
Establish an Interconnection Agreement
with Verizon New England, Inc. d/b/a
Verizon Massachusetts Inc. f/k/a New
England Telephone & Telegraph Co. d/b/a
Bell Atlantic - Massachusetts

D.T.E. 02-45

Initial Set of Interrogatories and Document Requests

Global NAPs, Inc. (“Global”), submits this Initial Set of Interrogatories and Document Requests to Verizon Massachusetts Inc. f/k/a Bell Atlantic – Massachusetts, Inc. (referred to as “Verizon”). The following interrogatories are to be answered by Verizon in writing and under oath within the time prescribed by the Commission.

I. DEFINITIONS

1. “And” and “or” as used herein are inclusive, and shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the request matters that might otherwise be construed to be outside its scope.
2. “Any” means one or more.

3. “Arbitration Petition” means the Petition for Arbitration filed by Global on July 30, 2002 in this action, and any amendments thereto that may subsequently be filed.
4. “Centrex” means a telephone company service that uses central office switching equipment to route internal calls from one extension to another, to route incoming phone calls directly to the appropriate extension, to handle direct dialing of outbound calls, and to provide service features to similar private branch exchange (PBX) service.
5. “CLLI Code” means the Common Language Location Identifier code, originally developed by Bellcore that provides a method of identifying physical locations and equipment.
6. “CMRS” means Commercial Mobile Radio Services.
7. “Communications Act “means the Communications Act of 1934 as amended.
8. The terms “communicated” or “communication” include every manner or means of disclosure, transfer or exchange of information, and every disclosure, transfer or exchange, whether face-to-face, by telephone, in writing, whether in hard copy or electronically, by email, by mail, personal delivery or otherwise.
9. “Describe, discuss or analyze” when used with reference to a request for documents, means any document that, in whole or in part, characterizes, evaluates, appraises, assesses, or provides a general explanation of the specified subject.

10. “Document” means written, recorded or graphic materials of any kind, whether prepared by your company or by any other person that is in the possession, custody or control of your company. The term includes agreements, contracts, letters, emails, telegrams, inter-office communications, memoranda, reports, records, instructions, specifications, notes, notebooks, scrapbooks, diaries, diagrams, photographs, photocopies, charts, graphs, descriptions, drafts, minutes of meetings, conferences, telephone calls or other conversations or communications, recordings, published or unpublished speeches or articles, publications, transcripts of telephone conversations, ledgers, financial statements, microfilm, microfiche, tape, disk or diskette recordings and computer printouts. The term “document” also includes electronically stored data from which information can be obtained either directly or by translation through detection devices or readers; any such document is to be produced in a reasonably legible and usable form. The term “document” includes the original document (or a copy thereof if the original is not available) and all copies that differ in any respect from the original, including but not limited to any notation, underlining, marking or information not on the original.
11. “End Office” means a central office to which a telephone subscriber is connected.
12. “Foreign Exchange Service” means a telephone company exchange service that uses a private line to connect a subscriber’s local central office

with a distant central office in a community outside the subscriber's local calling area.

13. "Identify" or "identity" means to state or a statement of:
- (a) in the case of a person other than a natural person, its legal name, the address of its principal place of business, its telephone number, and the name of its chief executive officer;
 - (b) in the case of a natural person, his or her name, business telephone number, home and business addresses, employer, educational background including degrees earned and title or position;
 - (c) in the case of a service, the identity of its producer or distributor and its trade name;
 - (d) in the case of a document,
 - (i) the title of the document,
 - (ii) the author(s),
 - (iii) the title or position of the author(s),
 - (iv) the addressee(s),
 - (v) the title or position of the addressee(s),
 - (vi) the type of document,
 - (vii) the date it was prepared,
 - (viii) the number of pages it comprises,
 - (ix) the identity of all persons indicated as receiving copies of the documents,
 - (x) the identity of all persons who have received copies of, or been shown the document or any part thereof,
 - (xi) its subject matter,
 - (xii) its present location or custodian, and
 - (xiii) a reference to the document, if it has been produced;
 - (e) in the case of geographic boundaries, location, or coverage, a narrative description with sufficient detail to render the description identifiable, or if one is already in existence, a map, drawing, or other visual/graphic depiction of the area; and
14. "Including" means including but not limited to.

15. “LATA” means a local access and transport area as defined by 47 U.S.C. § 153(25).
16. “NXX Code,” “NXX,” or “End Office Code” means the three-digit switch entity indicator (*i.e.*, the first three digits of a seven digit telephone number). A single switch may handle multiple NXX Codes, and a single NXX Code may be shared among multiple switches (by means of thousands-block pooling, Local Number Portability, or otherwise).
17. “Or” means and/or.
18. “Person” means any natural person, corporation, partnership, company, sole proprietorship, unincorporated association or society, incorporated association, institute, joint venture, firm, governmental body or other legal entity, whether privately or publicly owned or controlled, for profit or not-for-profit or partially or fully government owned or controlled.
19. “Relate to” and “relating to” mean, without limitation, to make a statement about, refer to, discuss, describe, reflect, contain, identify or in any way pertain to, in whole or in part, or being logically, legally or factually related.
20. “POI” means a point of interconnection between two interconnected carriers.
21. “Verizon” and/or “Verizon-Massachusetts” means Verizon Massachusetts Inc. f/k/a Bell Atlantic – Massachusetts, Inc, North Inc, incumbent local exchange carrier(s), as defined by 47 U.S.C. § 251(h), in the State of Massachusetts.

22. “Verizon ISP” means Verizon’s Internet Service Provider (“ISP”) business. *See e.g.*, www.Verizononline.com.
23. “Verizon Response” means Verizon’s Response to Global’s Arbitration Petition to filed with the Commission in this action.
24. “SONET” means a synchronous optical network.
25. “Tandem Office” means a major phone company switching center for the public switched telephone network.
26. “Tariff” means any applicable tariff filed by Verizon, with the Massachusetts Commission of Public Utilities or the Federal Communications Commission, governing the rates, terms and conditions of any service offered by Verizon.
27. “Telecommunications Service” means the offering of telecommunications for a fee directly to the public, or such classes of users as to be effectively available directly to the public as defined in 47 U.S.C. §150(46).
28. “You,” “your,” and “Verizon” mean and refer to Verizon, its predecessors, successors, subsidiaries, parents, divisions and affiliates and present and former partners, officers, directors, employees, agents, voting trustees and other persons acting on behalf of it or one or more of its predecessors, successors, subsidiaries, parents, divisions or affiliates, including but not limited to employees, independent contractors consultants, attorneys, or other agents having possession, custody or control of documents or information called for by this request.

29. The singular form of a noun or pronoun shall be considered to include within its meaning the plural form of the noun or pronoun, and vice versa.

The masculine form of a noun or pronoun shall be considered to include within its meaning the feminine form of the noun or pronoun, and vice versa.

30. Regardless of the tense employed, all verbs shall be read as applying to the past, present and future as is necessary to make any paragraph more, rather than less, inclusive.

II. INTERROGATORIES

- 1) Please provide any and all studies, estimates, or calculations, that Verizon and/or its witnesses have undertaken with respect to the transport costs to be incurred by Verizon related to:
 - a) Global NAPs' single POI interconnection proposal;
 - b) Verizon Massachusetts's "GRIPS" or "VGRIPS" proposal.
- 2) Please provide any and all studies, estimates, or calculations, that Verizon and/or its witnesses have undertaken with respect to Verizon's estimate of the transport costs to be incurred by Global NAPs related to:
 - a) Global NAPs' single POI interconnection proposal;
 - b) Verizon Massachusetts's "GRIPS" or "VGRIPS" proposal.
- 3) Please indicate what rate Verizon Massachusetts proposes to charge Global NAPs for transport outside Verizon Massachusetts's local calling areas under its VGRIPs proposal and provide a citation to the most recent applicable tariff(s), including page numbers and effective dates.
- 4) Please indicate the cost(s) for each of the charges listed in response to interrogatory 3 (above).
- 5) Does Verizon Massachusetts propose to charge Global NAPs just for the incremental transport distance, between the local calling area boundary and the POI/IP, or to charge Global NAPs for the entire distance between the Global NAPs POI and the IP, *including* the transport that Verizon Massachusetts undertakes within the local calling area?
- 6) With respect to the rate Verizon Massachusetts proposes to bill Global NAPs for transport, provide the methodology used and provide all supporting documentation used to determine the costs and develop the transport rates.

- 7) Please indicate when the transport charges identified in response to Question 3 were developed and, if and when approved by the Commission of Public Utilities of Massachusetts (“Commission”).
- 8) Please indicate the date the last Verizon Massachusetts UNE transport rates were set and identify the relevant proceeding by docket or case number.
- 9) Does Verizon Massachusetts provide any form of a single number service arrangement to Verizon Online? If the answer is yes, provide the tariff(s), pricing guides, or contracts under which all such arrangements are supplied by Verizon Massachusetts. If any responsive information such as the tariffs are publicly available, you may provide a specific reference to that material (e.g., tariff name, section number, and effective date) rather than a physical copy.
- 10) For each service identified in response to Question 9, please provide Verizon Massachusetts’s costs for all transport performed by Verizon Massachusetts in connection with providing the service. Provide all such data, where available, on:
 - a) A per-line basis;
 - b) A per-minute basis; and
 - c) A per-mile basis.
- 11) Provide Verizon Massachusetts’s most recent cost studies for all forms of unbundled interoffice transport for which a tariff or SGAT has been approved by the Commission.
- 12) Is Verizon Massachusetts aware of any technical limitation that would prevent Verizon Massachusetts from providing a single number service arrangement to ISPs or other customers in Massachusetts? If the answer is yes, provide all documents, including network planning and engineering documents, that Verizon Massachusetts relies upon to support that claim.
- 13) Does Verizon Massachusetts offer single number service arrangements in Massachusetts or plan to offer such a service in Massachusetts within the time period covered by the interconnection agreement that is at issue in this arbitration? If the answer is yes, please provide the following:
 - a) Identify all hubbing points, by LATA name, wire center name and Common Language Location Identifier (CLLI) code, that are used to provide single-number service in Massachusetts. If any hubbing points are located in the Massachusetts LATA, explain why they are not listed in Verizon Telephone Companies Tariff FCC No. 1, Section 16.5.3 (IPRS Terms and Conditions).
 - b) Describe with specificity the manner in which single number arrangement calls are routed through the Verizon Massachusetts network and delivered to the Internet gateway point(s).
 - c) Provide all cost studies and/or other support indicating that access charges are being paid for calls that pass between Verizon’s defined local calling areas.

- 14) With respect to the deployment of voice over packet switching in Massachusetts, please indicate if there are any differences to customers as a result of such deployment, including any differences in toll or other charges.
- 15) Please indicate whether such implementation will increase or decrease costs and provide any and all cost studies or financial impact studies supporting such assertion.
- 16) Please indicate the price(s) for transport in Verizon Massachusetts's territory charged to CLECs and the availability of same between:
 - a) all local exchange calling areas defined by Verizon in Massachusetts.
 - b) If Verizon Massachusetts alleges that non-Commission approved transport rates should be applied to Global NAPs, indicate the rationale for such application and the cost support for such alleged charges.
- 17) Does Verizon Massachusetts believe that Verizon's IPRS or PRI-SNS 500-number service offerings (including Internet Protocol Routing Service as offered in Verizon Telephone Companies Tariff FCC No. 1 (Access), Section 16.5) are priced so as to provide "additional compensation for the long-distance handling" of traffic transported outside of the local calling area, before it reaches the IPRS hub? If the answer is yes, provide all evidence that Verizon Massachusetts relies upon to support that claim.
- 18) Does Verizon Massachusetts ever provide service to a customer where the NPA-NXX code is assigned to a rate center that differs from the rate center in which the service is physically terminated, by a means other than through the use of a leased channel dedicated specifically and solely to that customer? If the response is in the affirmative, describe the manner in which such service is physically provided and identify all charges that would apply for such a serving arrangement.

Respectfully submitted,

Global NAPs, Inc.

By: _____

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